

Responsiveness Summary
To Comments Made by the Environmental Protection Agency, Region IX
For

Proposed Air Quality Permit No. 1000160

El Paso Natural Gas Company
San Simon Compressor Station

The following comments were made by the EPA, as received on December 9, 1997.

Comment 1: Attachment A. Section III.B.5. Permit Revision, Reopening, Revocation, and Reissuance, or Termination for Cause. Please correct this section as indicated in Comment #1 of the enclosed previous comment letter, dated November 14, 1997.

Response: To clarify that permit reopenings do not result in resetting the five-year term, except for permit reopenings to include new applicable requirements, Section III.B.5 has been revised as follows:

- (i) Section III.B.5 has been renamed as Section III.C
- (ii) The following sentence has been added to the language:

"Permit reopenings for reasons other than those stated in paragraph III.B.1 of this Attachment shall not result in a resetting of the five year permit term."

Comment 2: Attachment A. Section XIII. Reporting Requirements. Please correct this section as indicated in Comment #2 of the enclosed previous comment letter.

Response: To clarify the reporting requirements of the permit for the source, Section XIII has been rewritten to read as follows:

"Permittee shall comply with all of the reporting requirements of this permit. These include all of the following:

- (i) Compliance certifications pursuant to Attachment A, Section VII of this permit.**
- (ii) Permit deviation reporting pursuant to Attachment A, Sections XI.A, XI.B, and XI.C of this permit.**
- (iii) Reporting requirements listed in Attachment B, Section III of this permit."**

Note: Making this modification results in Section III.B of Attachment "B" becoming

redundant. Therefore, it was deleted.

Comment 3: Attachment A. Section XVI. Facility Change Without Permit Revision. Please correct this section as indicated in Comment #3 of the enclosed previous comment letter.

Response: ADEQ agrees with EPA on this comment. To clarify the meaning of Section XVI, the following two changes have been made:

- (i) The last sentence of Section XVI.C has been deleted
- (ii) Section XVI.C.1 has been deleted.

With these changes, the permit does not address facility changes which would not require notification to ADEQ. ADEQ is committed to working one-on-one with various industrial source groups to develop lists of such facility changes that would not require notification.

In addition to these changes, the review process revealed that the permit shield exemption for facility changes without revisions and minor revisions had been omitted from the permit. Consequently, Section X X of Attachment A of the permit now reads as follows:

"Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements identified in Attachment "C" of this permit. The permit shield shall not apply to any changes made pursuant to Section XV.B of this Attachment and Section XVI of this Attachment."

Comment 4: Attachment A. Section XVII.B. Testing Requirements. Please correct this section as indicated in Comment #4 of the enclosed previous comment letter.

Response: To clarify the intent of the testing requirements, Section XVII has been modified to read as follows:

XVII TESTING REQUIREMENTS

[A.A.C.R18-2-312]

A. Operational Conditions During Testing

Tests shall be conducted during operation at the normal rated capacity of each unit, while operating at representative operational conditions unless other conditions are required by the applicable test method or in this permit. With prior written approval from the Director, testing may be performed

at a lower rate. Operations during start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative operational conditions unless otherwise specified in the applicable standard.

B. Test Plan.....

Comment 5: Attachment A. Section XX. Permit Shield. Please correct this section as indicated in Comment #5 of the enclosed previous comment letter.

Response: Section XX has been modified to read as follows:

"Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements identified in Attachment "C" of this permit. The permit shield shall not apply to any changes made pursuant to Section XV.B of this Attachment and Section XVI of this Attachment."

Comment 12: Attachment B. Section IV.B. Testing Requirements. The citation is missing from this section. It should be (A.A.C. R18-2-306.A.3). Note that previous ADEQ draft natural gas compressor station permits included a citation in the Testing Requirements section to A.A.C. R18-2-311 and 312. Because these rules were not approved into ADEQ's Title V program, the EPA suggests these sections not be cited in ADEQ Title V permits to avoid possible problems in the future.

Response: The missing citation (A.A.C. R18-2-306.A.3) has been added to the permit. Citations to A.A.C. R18-2-311 and 312 have been removed from the permit.

Comment 13: Attachment B. Section IV.C. Testing Requirements. As explained in Comment #9 of the enclosed previous comment letter, "alternate and equivalent test methods" must be clearly defined in the permit. This applies for all required testing, regardless of where the testing requirement is given. Because the EPA does not have a copy of the current state rules, it is unclear what is contained in Articles 9 and 11, and why an exception was made for these sections.

Response: The Permittee has requested that they be provided the flexibility to employ other effective testing methods that meet the requirements of AAC R18-2-311(D). AAC R18-2-311(D) states that except for emissions testing required under Articles 9 and 11 of AAC Chapter 18, alternative and equivalent test methods as specified in Appendix A of 40 CFR 60 may be submitted and approved by the Director under certain circumstances (AAC R18-2-311(D.1,D.2,D.3)). The following language has been added to the permit:

"The Permittee may submit an alternate and equivalent test method(s) that is listed

in 40 CFR Subpart 60, Appendix A to the Director in any test plan for approval by the Director."

Comment 14: Attachment C. Applicable Regulations. As described in Comment # 5 above, there are two options for obtaining a permit shield. If Section XX (Permit Shield) of Attachment A is deleted completely, then Attachment C must include language that explicitly states a permit shield is granted to the permittee. For either option, an adoption date of the version of each rule that is being shielded from must be included in Attachment C.

Response: Please see Response to Comment 5. Attachment C now states : "Compliance with the terms contained in this permit shall be deemed compliance with the following federally applicable requirements **in effect on the date of permit issuance:.....**".

Comment 15: Attachment E. Insignificant Activities. Please correct this section as indicated in Comment #11 of the enclosed previous comment letter.

Response: AAC R18-2-101.54 defines an "insignificant activity" as follows:

"Insignificant activity" means an activity in an emissions unit that is not otherwise subject to any applicable requirement and which belongs to one of the following categories:

- a. Landscaping.....etc.
- b. Gasoline storage tanks.....etc.
- c. Diesel and.....etc.
- d. Batch mixers.....etc.
- e. Wet sand.....etc.
- f. Hand-held or manually operated equipment.....etc.
- g. Powder....etc.
- h. Internal...etc.
- i. Lab equipment....etc.
- j. Any other activity which the Director determines is not necessary, because of it's emissions due to size or production rate, to be included in an application in order to determine all applicable requirements and to calculate any fee under this Chapter.

From this definition, it can be seen that under Arizona rules for a unit to qualify as an insignificant activity, there should be no generally applicable requirements that the source may be subject to. This definition is different from the definition of insignificant activities under Part 70. All the activities listed under Attachment "D" of the permit have been determined not to have any applicable requirements.

Comment 16: Technical Support Document. The technical support document should provide a

clear and concise explanation of all requirements in the permit. We found most of this document to be clear and concise, but are concerned by the justification given for excluding PM and opacity monitoring requirements on the turbines engines. Instead of giving data to defend ADEQ's decision, the technical support document refers the reader to a "preceding discussion". While today it is relatively simple to find the "preceding discussion" in earlier technical support documents, through the years (as facilities shut down, etc.) these documents may become much less accessible. Given the small amount of data involved for justification, EPA suggests that ADEQ include the data in each permit's technical support document. Alternatively, ADEQ can make a more specific reference to the exact permit that contains the "preceding discussion". If this option is chosen, ADEQ must ensure that any referenced material is readily available.

Response: ADEQ understands EPA's concern and will make all efforts to ensure that any referenced material is readily available. However, "preceding discussion" as stated in the technical support document was meant to refer the reader back to Section II.B of the technical support document where the justification in terms of numeric data is given and not refer to any outside material as was interpreted by the EPA. A clarification has been made to specify the reference.

The following comment was made by EPNG during the Public Comment period. The following response was made by ADEQ after its discussions with the EPA during the Teleconference on January 9, 1998.

Comment: *II. Compliance with permit conditions:*

A. The first sentence of this provision should be reworded to conform to the permit shield provisions of R18-2-325:

The Permittee shall comply with all conditions of this permit, which sets forth all applicable requirements of Arizona's air quality statutes and the air quality rules.

The existing language could be read as requiring the Permittee to comply with "all applicable requirements" which contradicts the purpose of a Class I permit.

Response: ADEQ had initially agreed with EPNG on this issue. However, EPA as a part of their comments had concerns regarding the addition of this phrase. According to the EPA, the condition could be incorrectly interpreted to provide permit shield for all those requirements which have not been identified in the permit. Upon a review of our regulations, it was decided to use the language as quoted in A.A.C. R18-2-306.A.8. Therefore, there will be no change in the permit condition.

RESPONSIVENESS SUMMARY

To EPA Comments on Proposed Title V Permit
During Official 45-Day EPA Review Period for

Air Quality Control Permit No. 1000160
El Paso Natural Gas Company
San Simon Compressor Station

The following comments were made during the official 45-day EPA Review period:

Comment 1: *Attachment B.I.A.2. Opacity Standard. This permit condition limits the gas turbines to "40 percent opacity measured in accordance with the Arizona Testing Manual, Reference Method 9". As written, this could be read to imply an exclusive link between the emission limit and the method of determining compliance. Conditions in a Title V permit cannot limit the types of data or information that may be used to prove a violation of any applicable requirement, i.e., restrict the use of any credible evidence. To correct this problem, emission limits should be separated from the required method of monitoring by placing each in its respective section of the permit. Because no Method 9 tests will be required for this facility, simply removing the language referring to Reference Method 9 from the Emission Limits/Standards section will correct this problem. Also, not that when the SIP language itself links an emission limit with a specific test method, the SIP overrides any language in the permit. Thus, EPA will not comment on permit language quoted directly from the rule in the SIP. However, we still encourage ADEQ to separate emission limits from test methods.*

Response: ADEQ agrees with the EPA on this comment. Condition I.A.2 of Attachment B has been revised to read as follows:

"Permittee shall not cause, allow or permit to be emitted into the atmosphere from the three General Electric stationary gas turbine engines, or from any other stationary rotating equipment, smoke for any period of time greater than ten consecutive seconds which exceeds 40 percent opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes."

Comment 2: *Attachment B.I.B.1.a. Open areas, Roadways, Streets, Storage Piles or Material Handling. This condition could create a problem by excluding credible evidence, as described in comment #2 above. However, unlike the case above, the test method is actually cited in the SIP rule itself. While we stated we cannot require a separation of the limit and the monitoring method in this situation, the language in the permit should be revised to match the language in the SIP rule exactly ("greater than 40% measured in accordance with the Arizona Testing Manual, Reference*

Method 9"). We recognize this seems like a very trivial change, but have received guidance from within the EPA that the language "measured in accordance with" matches the language in the NSPS 40 CFR 60.8 directly, and is somehow more acceptable.

Response: ADEQ agrees with the EPA on this comment. Condition I.B.1.a of Attachment B has been revised to read as follows:

"Visible emissions from open areas, roadways, streets, storage piles, or material handling shall not have an opacity greater than 40% measured in accordance with the Arizona Testing Manual, Reference Method 9."

Comment 3: *Attachment B.III. Reporting Requirements. Reports of required monitoring must be submitted every 6 months, pursuant to A.A.C. R18-2-306.A.5.a. As described in the preamble to 40 CFR Part 70, these reports must include all recordkeeping performed in place of monitoring, i.e., (for this permit) records of dust control measures required by Section II.B.1. Please add a new provision (III.C) requiring the Permittee to submit a report, at least every 6 months, of all records required under Section II.B. This citation for the new condition should be A.A.C. R18-2-306.A.5.a. For convenience, this requirement may be timed to coincide with the compliance certifications required by Section VII of Attachment A.*

Response: ADEQ agrees with the EPA on this comment. A new condition III.C has been added to the permit. Section III.C reads as follows:

"At the time the compliance certifications required by Section VII of Attachment "A" are submitted, the Permittee shall submit reports of all monitoring activities required by Section II of this Attachment performed in the six months prior to the date of the report."